CUSO INTERNATIONAL PRIVACY & PERSONAL INFORMATION PROTECTION POLICY

Cuso International is committed to protecting the privacy of the personal information of its employees, volunteers, donors, partners, clients and other stakeholders.

All personal information will be kept strictly confidential, and may only be used for identified operational reasons.

<u>Employees who do not follow</u> the principles and procedures regarding collection, use and disclosure of personal information- as set out in this policy- will be subject to disciplinary measures, up to and including termination.

DEFINITIONS

Personal Information: any factual or subjective information, recorded or not, about an individual that includes race, ethnic background, colour, age, gender, income, marital status, family status, religion, political opinions, education, trade union membership, sexual orientation, health information & medical history, photographs, criminal record, employment history, financial status, donation records, address, telephone number(s) and any numerical identification such as Social Insurance Number.

Personal information also includes information that may relate to the work performance of the individual, as well as any allegations, investigations or findings of wrongdoing, misconduct or discipline.

Personal information does <u>not</u> include the name, work title, business address, business telephone of any employee.

Personal health information: Information about an identifiable individual that relates to the physical or mental health of the individual, the provision of health care to the individual, the individual's entitlement to payment for health care, the individual's health card number, the identity of providers of health care to the individual or the identity of substitute decision-makers on behalf of the individual.

Third party: individuals or organizations other than the subject of the records or representatives of Cuso International. In certain circumstances, the organization may be entitled to provide personal information to an external party acting as an agent of Cuso International.

PRINCIPLES

Accountability

Cuso International is responsible for personal information under its control and will designate a Privacy Officer who will be accountable for maintaining compliance with all relevant legislation.

Identifying purpose

Reasonable purposes must be identified *at*, or before the time of, information collection.

Consent

Knowledge and consent of the individual is required before collection, use or disclosure of information, subject to a few exceptions, e.g. to satisfy legal requirements or in serious emergency situations.

Limiting collection

Collection should be limited to information which is necessary for the purposes identified by the organization and must only be collected by fair and lawful means.

Limiting use, disclosure and retention

Information collected for one purpose should not be used or disclosed for another purpose without the consent of the individual involved, or as required by law. It should not be retained any longer than necessary for the last specified purpose.

Accuracy

Information must be as accurate, complete and up-to-date as necessary for the purposes for which it is used.

Safeguards

Personal information must be protected in a manner appropriate to its sensitivity.

Openness

Cuso International must make our personal information policies and practices known to its constituents.

Individual access

Individuals have a right to know what information Cuso International has about them and how it has been used or disclosed. They have the right to have access to the information and to challenge its accuracy and completeness.